

Hon. Thomas S. Zilly

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STRAITSHOT RC, LLC, a Delaware  
corporation,

Plaintiff,

v.

TELEKENEX, INC., a Delaware corporation;  
MARK PRUDELL and JOY PRUDELL,  
husband and wife and the marital community  
composed thereof; MARK RADFORD and  
NIKKI RADFORD, husband and wife and the  
marital community composed thereof; JOSHUA  
SUMMERS and JULIA SUMMERS, husband  
and wife and the marital community composed  
thereof; ANTHONY ZABIT and JANE DOE  
ZABIT, husband and wife and the marital  
community composed thereof; BRANDON  
CHANEY and JANE DOE CHANEY, husband  
and wife and the marital community composed  
thereof; MAMMOTH NETWORKS, LLC and  
BRIAN WORTHEN and JANE DOE  
WORTHEN, husband and wife and the marital  
community composed thereof,

Defendants.

Case No. 2:10-cv-00268-TSZ

**DECLARATION OF KRISTIN  
COLLINSWORTH IN SUPPORT OF  
DEFENDANT TELEKENEX'S  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO ADD NEW  
DEFENDANTS AND FOR LEAVE TO  
FILE FOURTH AMENDED  
COMPLAINT**

***NOTE ON MOTION CALENDAR:***  
DECEMBER 3, 2010

**DECL. OF COLLINSWORTH ISO OPP. TO MOTION FOR  
LEAVE TO ADD NEW DEFENDANTS AND FILE  
4<sup>TH</sup> AMENDED COMPLAINT - 1  
(Case No. 2:10-cv-00268-TSZ)**

LITTLER MENDELSON, P.C.  
One Union Square  
600 University Street, Suite 3200  
Seattle, WA 98101.3122  
206.623.3300

1 TELEKENEX, INC., a Delaware Corporation,

2 Third-Party Plaintiff,

3 v.

4 STRAITSHOT RC, LLC., a Delaware limited  
5 liability company; STEPHEN PERRY and  
6 JANE DOE PERRY, and the marital community  
7 composed thereof; and ANDREW GOLD and  
8 JANE DOE GOLD, and the marital community  
9 composed thereof,

10 Third-Party Defendants.

11 MAMMOTH NETWORKS, LLC, a Wyoming  
12 limited liability company,

13 Third-Party Plaintiff,

14 v.

15 CLARITAGE STRATEGY FUND, L.P., a  
16 Cayman Islands limited partnership, and  
17 STRAITSHOT RC, LLC, a Delaware limited  
18 liability company,

19 Third-Party Defendants.

20 I, Kristin Collinsworth, declare as follows.

21 1. I am a paralegal employed by the law firm Littler Mendelson, attorneys for  
22 Telekenex, Inc., in this matter. I have been employed at Littler Mendelson for approximately 7  
23 years. I make this declaration in support of Defendant Telekenex's Opposition to Plaintiff's  
24 Motion for Leave to Add New Defendants and for Leave to File Fourth Amended Complaint. I  
25 have personal knowledge of the statements contained herein and am competent to testify thereto.

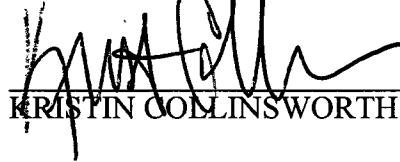
26 2. I participated in the gathering of documents for production to Plaintiff and have  
conducted a thorough review of the documents produced by Defendant Telekenex, Inc. in this  
matter. Attached as **Exhibit 1** please find a list of Defendants' document production from Littler  
Mendelson as of December 3, 2010.

**DECL. OF COLLINSWORTH ISO OPP. TO MOTION FOR  
LEAVETO ADD NEW DEFENDANTS AND FILE  
4<sup>TH</sup> AMENDED COMPLAINT - 2  
(Case No. 2:10-cv-00268-TSZ)**

LITTLER MENDELSON, P.C.  
One Union Square  
600 University Street, Suite 3200  
Seattle, WA 98101.3122  
206.623.3300

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct.

3 Executed at Seattle, Washington, this 3rd day of December, 2010.

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5 KRISTIN COLLINSWORTH  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 3, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Jessica L. Goldman  
Lawrence Carl Locker  
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**ATTORNEYS FOR MAMMOTH NETWORKS  
LLC**

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**ATTORNEYS FOR PLAINTIFF**

**ATTORNEYS FOR DEFENDANTS MARK  
AND JOY PRUDELL AND MARK AND  
NIKKI RADFORD**

and I hereby certify that I have mailed by the United States Postal Service the foregoing document to the following non CM/ECF participants:

N/A

Dated: December 3, 2010

/s/Sally Swearinger  
**Sally Swearinger**  
[sswearinger@littler.com](mailto:sswearinger@littler.com)  
**LITTLER MENDELSON, P.C.**

Firmwide:98977515.1 066331.1001

**DECL. OF COLLINSWORTH ISO OPP. TO MOTION FOR  
LEAVE TO ADD NEW DEFENDANTS AND FILE  
4<sup>TH</sup> AMENDED COMPLAINT - 4  
(Case No. 2:10-cv-00268-TSZ)**

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# **EXHIBIT 1**

06631.1001

Straitshot v. Telekenex

**DEFENDANT'S DOCUMENT PRODUCTION**

Bates: TKX(LM)	Description
01-32	Telekenex Insurance Policy From Axis Reinsurance Company, Policy No. RNN587110. Inception Date of 04/27/2009. Expiration Date of 04/27/2010.
033	Transition Plan Spreadsheet (285 KB file produced via CD)
034	Carrier Mappings-v.2 Spreadsheet (162 KB file produced via CD)
035	Copy of Circuits Backup Working Spreadsheet (1.19 MB file produced via CD)
036-042	Telekenex, Inc. Historical Balance Sheets as of FYE 2004-2010 – containing figures on Current Assets, Fixed Assets, Current Liabilities, Long-Term Liabilities and Net Stockholders Equity, and additional operating costs
043-046	Telekenex National Sales Comp Plan 2010 (Effective August 1, 2010) signed by Mark Prudell
047	January 2009 Formal Telekenex Offer Letter to Mark Prudell
048	January 2009 Formal Telekenex Offer Letter to Mark Radford
049-051	Karen Salazar Outlook Calendar Printouts dated March 19, 2009 and April 06-07, 2009;
0052	Transition Plan Spreadsheet (285 KB file produced via CD)
053	Aubeta Certificate of Administrative Dissolution
054-074	Asset Purchase Agreement between Telekenex IXC, Inc. and AuBeta Networks Corporation dated March 27, 2009
075-087	Consent and Forbearance Agreement to Loan and Security Agreement between Silicon Valley Bank and AuBeta Networks Corp dated March 24, 2009
088-0286	Telekenex, Inc. Accounts Receivable Account QuickReport from 09/02/2008 to 04/30/2010
0287-0374	ABNC IXC Payments Against AR Sep 2008 thru April 2010
0375-0377	Telekenex Inc. Income Tax Statements for Mark Prudell, Joshua Summers and Mark Radford
0378-0379	MM Customers - List of Customers Telekenex retained..with figures re Total Sold and Total Lost
0380	Copy of Circuits Back up Working Spreadsheet (1.88 MB file produced via CD)
0381-0409	Telekenex Vice President Quota Detail Report for FY 2008 – contains list of Accounts, Revenue Type, Project timeframe, Term \$, Lead Source, etc.
0410 – 0452	Telekenex Vice President Quota Detail Report for FY 2009
0453	Telekenex Board Minutes February 11, 2009
0454	Telekenex Board Minutes April 8, 2009
0455-0468	IXC, Inc. Financial Report dated December 31, 2009, containing Balance Sheet, Statement of Operations, Statement of Changes in

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**DEFENDANT'S DOCUMENT PRODUCTION**

	Stockholder's Equity (Deficit), Statement of Cash Flows, and Notes to Financial Statements
0469	Telekenex Income Statement for Six Months Ending June 30, 2010
0470	Telekenex Balance Sheet dated June 30, 2010